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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

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BRYANT LECHUGA,

Plaintiff,

vs.

RAMPARTS, LLC, a Nevada Limited Liability  
 Company; DOES I-X; and, ROE Business  
 Entities I-X,

Defendants.

Case No.: 2:19-cv-01731-APG-BNW

**STIPULATION AND ORDER TO TAKE  
 DEPOSITION OUTSIDE OF  
 DISCOVERY PERIOD**

**[FIRST REQUEST]**

The parties, by and through their undersigned counsel hereby stipulate and agree that the Plaintiff may take the deposition of Defendant RAMPARTS, LLC pursuant to FRCP Rule 30(b)(6) commencing on December 8, 2020 at 1:00 p.m. which is after the present discovery cutoff date of December 4, 2020. The deposition had been scheduled for December 4, 2020 at 1:00 p.m.

The reason for rescheduling the deposition from December 4 to December 8 is that on the evening of December 2, 2020 Defendant served its Fourth Supplemental Disclosures which had attached to it 933 pages of documents and on the evening December 3, 2020 Defendant served its Fifth Supplemental Disclosures which had attached to it 1,240 pages of documents. Defendant believes these documents are potentially responsive to Plaintiff's Requests for

1 Production and thus, supplemental to Defendant's recently served responses to Plaintiff's  
2 Requests for Production.

3 As these 2,173 pages of supplemental documents were served less than 48 hours before  
4 the deposition was set to commence, Plaintiff's counsel was unable to review that quantity of  
5 documents to prepare for the deposition in time. Accordingly, the parties have agreed to move  
6 the deposition to December 8, 2020 and because that date is after the December 4, 2020 close of  
7 discovery the parties hereby seek the court's approval for this action.

8  
9 Respectfully submitted,

10 Dated this 4<sup>th</sup> day of December, 2020,

Dated this 4<sup>th</sup> day of December, 2020,

11 /s/James P. Kemp  
12 JAMES P. KEMP, ESQ.  
13 Nevada Bar No: 6375  
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14 *Attorneys for Plaintiff*

/s/ Joshua A. Sliker  
JOSHUA A. SLIKER, ESQ.  
Nevada Bar No.: 12493  
JACKSON LEWIS  
15 *Attorneys for Defendants*

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17  
18 **ORDER**

19 **IT IS SO ORDERED**

20 **DATED:** 10:47 am, December 08, 2020

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22 **BRENDA WEKSLER**  
23 **UNITED STATES MAGISTRATE JUDGE**  
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